

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CARLOS PINEDA and ALEXANDRA PEREZ,)	
Plaintiffs,)	C.A. No. 05-10216-JLT
)	
v.)	
)	
DANIEL KEELER, DENNIS HARRIS, JOSEPH R.))	
WATTS, JOSEPH P. TOOMEY, WILLIAM J.)	
GALLAGHER, EDWARD GATELY, JANINE)	
BUSBY, and the CITY OF BOSTON,)	
Defendants.)	

JOINT MOTION TO ENLARGE THE TIME TO COMPLETE DEPOSITIONS

Now come the Parties and request that this Honorable Court enlarge the time within which to complete depositions, from September 15, 2006 to November 15, 2006. Many depositions have been taken but, due to other obligation of counsel, additional time is needed to complete approximately 10 depositions.

Counsel also requests that the time within which to file Motions for Summary Judgment be enlarged to January 31, 2007.

Respectfully submitted,
The Plaintiffs Carlos Pineda and
Alexandra Perez,
By their attorneys,

//S// STEPHEN HRONES
Stephen Hrones (BBO No. 242860)
Jessica D Hedges (BBO No. 645847)
Hrones Garrity & Hedges
Lewis Wharf–Bay 232
Boston, MA 02110-3927
T) 617/227-4019

Respectfully submitted,
The Defendants DANIEL KEELER,
DENNIS HARRIS, JOSEPH R.
WATTS, JOSEPH P. TOOMEY,
WILLIAM J. GALLAGHER, EDWARD
GATELY, JANINE BUSBY, and the CITY
OF BOSTON,
By their attorney,

//S// HELEN LITSAS
Helen Litsas
Assistant City Solicitor
(BBO No.545455)
City of Boston Law Department
City of Boston, Rm. 615 City Hall
One City Hall Plaza
Boston, MA 02201
(617) 635-4023